

KTF:RSB

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. §§ 371, 2 and 3551 et seq.)

KUMAR PERSAUD,

23-MJ-00975

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ELOY ROMAN, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

Between on or about March 29, 2023, to June 15, 2023, within the Eastern District of New York and elsewhere, the defendant KUMAR PERSAUD, together with others, did knowingly and willfully conspire to steal, take, and abstract from United States mail routes and other authorized depositories for mail matter one or more letters, packages, bag and mail, and any article and thing therein, from and out of any mail, post office, post station, letter box, mail receptacle, mail route and other authorized depository for mail matter.

In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant KUMAR PERSAUD, together with others, did commit and cause the commission of, among others, the following:

The object of the conspiracy was to steal, take, and abstract from United States mail routes and other authorized depositories for mail matter one or more letters, packages, bag

and mail, and any article and thing therein, from and out of any mail, post station, letter box, mail receptacle, mail route and other authorized depository for mail matter. The defendant acted as either the principal or an accomplice as defined in 18 U.S.C. §2, or both.

#### OVERT ACTS

(a) On or about March 29, 2023, PERSAUD unlawfully removed mail from a relay box at the intersection between Clinton Street and Union Street in Brooklyn, New York.

(b) On or about June 15, 2023, PERSAUD was wearing a United States Postal Service uniform, although he is not a postal employee.

(Title 18, United States Code, Sections 371 and 3551 et seq.<sup>1</sup>)

The source of your deponent's information and the grounds for his belief are as follows:<sup>2</sup>

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been involved in the investigation of numerous cases involving mail theft and improper use of mail keys. I have been with the USPIS since January 2020. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and reports of other law enforcement officers involved in the investigation.

2. To help mail carriers in completing their walking routes, the United States Postal Service ("Postal Service") has placed green relay boxes at intersections throughout New York City. Before a carrier starts a route, the carrier places mail into bags sorted by location.

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<sup>1</sup> 18 U.S.C. §§ 3551 et seq. provides for the authorized sentences for a defendant found guilty of any Federal statute.

<sup>2</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

To avoid carrying all the mail bags during a shift, the carrier has a driver transport them to relay boxes along the route.

3. Each box will carry several bags, so that the carrier may keep the bulk of mail in the boxes as the carrier walks with a smaller delivery load. The carrier returns to the box to refresh the load until the bags are empty, and then continues to another part of the route. Each bag may contain hundreds of mail items.

4. Moreover, each box has a lock that drivers and carriers may open with a Postal Service “arrow key,” each of which has its own serial number. The key is so named because it has the emblem of an arrow with the initials “U.S.P.S.” Based on my experience investigating cases and my interviews with Postal Service employees, the ordinary Postal Service practice is to keep a relay box always locked and to permit only drivers and carriers to open it.

5. Since approximately February 2023, the United States Postal Inspection Service (“USPIS”) has been investigating mail theft in the Red Hook neighborhood in Brooklyn, New York, specifically the 11231 zip code.

6. On or about March 29, 2023, there were several mail thefts reported to USPIS from United States Postal Service (“USPS”) management regarding thefts of relay boxes in the Red Hook area in Brooklyn, New York. Based on this information, USPIS obtained video surveillance from one of the theft locations, at the intersection of Clinton Street and Union Street in Brooklyn, New York. Based on my review of the video surveillance, I observed an unknown male in a USPS uniform remove mail from a relay box and placed it into a gold Toyota sedan (the “Vehicle”).

7. On or about March 30, 2023, USPS postal management shared a photograph that a resident took of the vehicle used by an individual accessing a relay box at

Henry Street and Third Place in Brooklyn, New York. The photograph included the license plate number. The vehicle in the photograph matched the Vehicle that was in the video surveillance from the day prior.

8. USPIS Postal Inspectors ran the license plate and spoke to the registered owner (“Individual-1”) of the license plate that was affixed to the Vehicle. Individual-1 explained to the USPIS Postal Inspector that she was awaiting a license plate in the mail but never received it.

9. On or about June 15, 2023, at approximately 3:30 p.m., the USPIS was notified by the New York City Police Department (“NYPD”) that two individuals were in custody who had been driving the Vehicle. One of the individuals arrested was KUMAR PERSAUD who provided his name and date of birth to NYPD. NYPD then performed a records check and confirmed PERSAUD’s identification. PERSAUD was arrested by NYPD for impersonating a public official because he was wearing a USPS postal uniform, as well as other state charges. Based on USPIS’s records search, PERSAUD has never been employed by the USPS.

10. Pursuant to an inventory search incident to arrest, the NYPD found a USPS arrow key, approximately 30 pieces of mail in names not belonging to PERSAUD from New Jersey as well as New York, and two photocopies of identification cards not bearing the photograph or name of PERSAUD nor other individuals in the Vehicle.

11. Once arrested, PERSAUD was given his Miranda rights and made several post-arrest statements. PERSAUD identified himself as the individual in the video surveillance depicted below removing mail from the relay box at the intersection between Clinton Street and Union Street in Brooklyn, New York.



12. PERSAUD stated, in sum and substance and in part, that he stole the mail and was paid by another individual (“Co-Conspirator-1”) approximately \$200 per bag of mail. PERSAUD stated that he had stolen mail from at least three other locations on March 29, 2023. At first, PERSAUD stated that he was a USPS employee and then later said that he never was a USPS employee.

WHEREFORE, your deponent respectfully requests that the defendant KUMAR  
PERSAUD, be dealt with according to law.

/s/ Eloy Roman  
ELOY ROMAN  
Postal Inspector  
United States Postal Inspection Service

Sworn to before me telephonically this  
2nd of November, 2023

Joseph A. Marutollo  
THE HONORABLE JOSEPH A. MARUTOLLO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK